

**REMARKS**

Claims 1-29 of the application stand rejected. Claims 4 and 6 have been canceled without prejudice and Claims 1, 5, 8-10, 17, 22 and 25 have been amended herein to more clearly define the scope of the presently claimed invention. Applicants respectfully request reconsideration of pending Claims 1-3, 5 and 7-29 in light of the amendments and remarks herein.

**35 U.S.C. § 102**

Claims 1, 3, 4, 6-9 and 17-24 stand rejected under 35 U.S.C. § 102 as anticipated by Electronic Arts "Madden 2001", hereafter "EA." Applicants respectfully traverse the rejection and submit that the claimed invention is not anticipated by EA. Most importantly, Applicants submit that EA is an improper reference because the figures and the corresponding manual pages do not appear to convey the actions that the Examiner attributes to them. In other words, while the Examiner claims that various other figures and/or pages of the manual indicate particular activities and/or displays, Applicants are unable to identify and/or confirm such activities and/or displays. Thus, for example, although the Examiner submits that "EA teaches, in EAfig 2 and manual Page 15, that there is an indicator, symbolized by the blue sphere, that is constrained to a 2D surface, the field, which lies obliquely to the display," the figures and manual page 15 do not appear to show or describe such an indicator.

Regardless, with respect to independent Claim 1, EA clearly does *not* disclose providing a 2D surface comprising a 2D projection of a 3D space on a display, the 3D space comprising a selected object, the 2D surface appearing to lie obliquely to the display. Although, as described above, the Examiner suggests that EA shows a 2D surface (i.e., the field), the Examiner does not give any indication of what the 3D space is and/or how the 2D surface relates to the 3D space. Applicants respectfully submit that EA does not show any 2D surface comprising a 2D projection of a 3D space, as claimed. Additionally, EA does not disclose an indicator that is constrained to the 2D surface to identify a center of interest, the indicator corresponding to the selected object in the 3D space and located on the 2D surface.

Similarly, with respect to independent Claim 17, EA does not disclose displaying a projection of a 3D space on a 2D surface, the 3D space including a user-selected object, and the 2D surface including an indicator located at a position corresponding to a position of the user-selected object in the 3D space, the projection simulating a user's perspective from a first viewpoint. As discussed above, although the Examiner suggests that EA shows a 2D surface (i.e., the field), the Examiner does not give any indication of what the 3D space is and/or how the 2D surface relates to the 3D space. In fact, there is no indication from the figures and/or manual pages that there is any projection of a 3D space on a 2D surface. Additionally, although the Examiner suggests that EA teaches "in EAfig2 and manual Page 14, a projection of a 3D space that has a 3D plane, where a user selectable object casts a shadow on a point, in the plane where the object can be selected through use of the circular indicator", it is not apparent in the figure (and there is no description in the manual pages) that EA contemplates an indicator located on the 2D surface at a position corresponding to the position of a user-selected object in the 3D space, as claimed. EA does not teach the elements of independent Claim 17 and therefore does not anticipate the claim.

Independent Claim 22 includes the same or similar limitations as independent Claims 1 and 17. More specifically, Claim 22 includes the limitation of a display unit that displays a projection of a 3D space on a 2D surface, the 2D surface appearing to lie oblique to the display unit. Claim 22 also includes the limitation of a user interface configured to receive user controls for moving an indicator on the 2D surface, the indicator on the 2D surface representing a selected one of the objects located in the 3D space and located at a position on the 2D surface corresponding to a location in the 3D space. Again, the Examiner suggests that EA discloses these elements (as previously discussed above), but in fact, Applicant respectfully submits that EA does not disclose displaying a projection of a 3D space on a 2D surface and/or an indicator located on the 2D surface at a position corresponding to the position of a user selected object in the 3D space. EA therefore also does not anticipate independent Claim 22.

Claims 3, 4, and 6-9 are dependant on Claim 1, Claims 18-21 are dependant on Claim 17 and Claims 23-24 are dependant on Claim 22. Claims 4 and 6 have been canceled herein without prejudice and the rejection to those claims is therefore moot.

With respect to Claims 3, 7-9, 18-21 and 23-24, since these dependant claims include all the elements of the independent claims, EA also does not anticipate Claims 3, 7-9, 18-21 and 23-24 for the same reasons. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 1, 3, 7-9, 17-25 under 35 U.S.C. §102.

35 U.S.C. §103

Claims 2, 5, 10-16 and 25-29 stand rejected under 35 U.S.C. §103 as being unpatentable over EA and Robertson, et al., U.S. Patent No. 6,414,677 ("Robertson"). Applicants respectfully traverse the rejection. Most importantly, Applicants submit that the combination of EA and Robertson is improper as it relies on hindsight. EA comprises a video game system and the portions provided by the Examiner include a visual representation of the screens and a description of some of the installation and game play mechanisms. Robertson, on the other hand, focuses on a user interface in which object thumbnails are rendered in a simulated three-dimensional surface and wherein the objects may be moved continuously on the surface with a two-dimensional input device (Robertson, Abstract). Applicants submit that the mere fact that a video game includes a user interface and that Robertson suggests a particular type of user interface does not render the combination of the references proper. In fact, since EA focuses on a video game user-interface while Robertson appears to focus on a graphical user interface to organize and access information or content (Robertson, Col. 6, lines 32-24), Applicants respectfully contend that barring hindsight, there is no teaching in either reference to suggest that these references may be properly combined and/or that one of ordinary skill in the art would think to combine the references. Applicants therefore respectfully submit that the combination of these references is improper.

Even assuming arguendo that these references were properly combined, the combination of EA with Robertson nonetheless does not teach or suggest the claimed invention. As previously described, the EA reference includes a visual representation of various screens in a video game and the manual pages discuss the installation and game play mechanism. With respect to Claim 10, the claim includes the limitation of rendering a first view of a 3D space from a first reference point, the 3D space comprising a user-selected object, the first view including a projection of the 3D space on a 2D surface and

the 2D surface including an indicator located at a position corresponding to a position of the user-selected object in the 3D space. Despite the Examiner's contention otherwise, as previously discussed above, EA does not teach or suggest this claimed limitation.

Robertson also does not teach or suggest this limitation and the Examiner does not suggest otherwise. The combination of EA and Robertson therefore does not teach or suggest the claimed elements and as a result, these references do not render Claim 10 unpatentable.

Claim 25 includes a similar limitation to Claim 10, i.e. a first projection of a 3D space from a first viewpoint, the 3D space comprising a user-selected object, the first projection including a projection of the 3D space on a 2D surface and the 2D surface including an indicator located at a position corresponding to a position of the user-selected object in the 3D space. As previously discussed, EA, alone and/or in combination with Robertson does not teach this claimed element and thus does not render Claim 25 unpatentable.

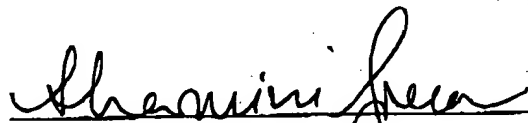
Claims 2 and 5 are dependant on Claim 1, Claims 11-16 are dependant on Claim 10 and Claims 26-29 are dependant on Claim 25. Claim 1 is discussed above under the heading "35 U.S.C. §102", while Claims 10 and 25 are discussed in the paragraphs directly above. As discussed above, EA, alone and/or in combination with Robertson does not render independent Claims 10 and 25 unpatentable. Thus, with respect to Claims 2, 5, 11-16 and 26-29, since these dependant claims include all the elements of the independent claims, EA and Robertson also do not render the claims unpatentable for the same reasons. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 2, 5, 10-16 and 25-29 under 35 U.S.C. §103.

**CONCLUSION**

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-3, 5 and 7-29 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (310) 406-2362.

Respectfully submitted,

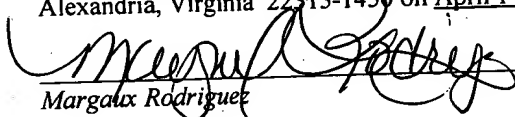
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Margaux Rodriguez  
April 14, 2004